

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Verna IP Holdings, LLC,

Plaintiff,

v.

BLACKBERRY CORPORATION,

Defendant.

Civil Action No.: 6:21-cv-01037-ADA

JURY TRIAL DEMANDED

**DECLARATION OF RAMON PINERO IN SUPPORT OF BLACKBERRY
CORPORATION'S MOTION TO DISMISS FOR IMPROPER VENUE**

I, Ramon Pinero, hereby declare as follows:

1. I have been working for BlackBerry Corporation ("BlackBerry") since 2015. I am currently the Vice President of Product and Services for BlackBerry AtHoc. I office in the BlackBerry facilities in Mountain View, California.

2. I am over the age of eighteen. I make this declaration based upon my personal knowledge and, if called upon to testify before the Court, I could and would testify competently to the truth of the matters set forth herein.

3. I am knowledgeable about various aspects of BlackBerry's business, including customers for BlackBerry's AtHoc management system and installations in which AtHoc is implemented for use in combination with Eaton WAVES Giant Voice System, which is a third-party public announcement system provided by Eaton Corporation. Unless otherwise stated herein, this declaration is based upon my personal knowledge, the records at BlackBerry, and/or information reported to me by other individuals in the organization with personal knowledge of such facts.

4. BlackBerry is currently and was, at all times on and after October 5, 2021, incorporated in Delaware.

5. In the United States, BlackBerry has sold AtHoc for use in combination with Eaton WAVES Giant Voice System by the United States Air Force and the United States Marine Corps.

6. BlackBerry has not sold AtHoc for use in combination with Eaton WAVES Giant Voice System by any entity in the United States that is not part of the United States Federal Government.

7. To the best of my knowledge, even though BlackBerry sold AtHoc for use in combination with the Eaton WAVES Giant Voice System by the United States Marine Corps, the United States Marine Corps did not implement the system.

8. The United States Air Force implemented AtHoc for use in combination with the Eaton WAVES Giant Voice System for the 146th Airlift Wing of the California Air National Guard at the Channel Islands Air National Guard Station in California. To the best of my knowledge, this is the only implementation in the United States of AtHoc for use in combination with Eaton WAVES Giant Voice System.

I certify under penalty of perjury that the forgoing is true and correct.

Executed on this 14th day of December, 2021 at Mountain View, California.

Respectfully submitted,

By: R. P.
Ramon Pinero